

NOTE

Subject: EPA Comments on Alliant Energy, Interstate Power & Light Co - Ottumwa
Generating Station, Ottumwa, IA Round 7 Draft Assessment Report

To: File

From: Jana Englander, OSWER, US EPA

Date: January 6, 2011

No Comments

State: No Comments

Company: See attached letter dated March 4, 2011



Interstate Power and Light Co.
An Alliant Energy Company

March 4, 2011

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Mr. Stephen Hoffman
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**Re: Response to Draft Assessment Reports
Ottumwa Generating Station**

Dear Mr. Hoffman:

This letter is sent on behalf of Interstate Power and Light Company's ("IPL") Ottumwa Generating Station. IPL received the Draft Coal Combustion Waste Impoundment, Round 7 – Dam Assessment Report for Ottumwa Generating Station (Site 012) dated October, 2010 ("Draft Report"). The site assessment was conducted by the United States Environmental Protection Agency's ("EPA") contractor Dewberry & Davis, LLC on October 6, 2010. EPA's cover email accompanying the Draft Report requests that comments be submitted to USEPA by March 7, 2011, and provides for a business confidentiality claim covering all or part of the information.

CONFIDENTIAL BUSINESS INFORMATION CLAIM

IPL is claiming business confidentiality for both the Draft and Final Reports associated with the site assessment of the coal combustion material management units at the Ottumwa Generating Station and for the comments submitted in this letter in their entirety, a claim which is being made in accordance with 40 C.F.R. Part 2, Subpart B.

Per the criteria established by 40 CFR. Part 2, Subpart B, §2.208, the documents for which confidential treatment is requested are entitled to confidential treatment because: (1) this claim is timely and has not been waived, (2) IPL has taken reasonable measures to protect the confidentiality of the information and intends to continue to take such measures, (3) the information is not reasonably obtainable without IPL's consent by other persons by use of legitimate means, (4) no statute

specifically requires disclosure of this information, and (5) the disclosure of the information is likely to cause substantial harm to IPL's competitive position.

All of the documents for which confidential treatment is requested help IPL maintain its competitive position. IPL protects the confidentiality of this information by making it available only to those within the company with a legitimate need to know the information for purposes of performing their jobs.

COMMENTS ON THE DRAFT ASSESSMENT

Listed below are the comments associated with the Draft Report for the IPL – Ottumwa Generating Station.

Italics indicate language in Draft Report. **Bold** indicates suggested language.

General Comment:

1. Remove "*Alliant Energy*" and insert "**Interstate Power and Light Company ("IPL")**". This should include "*Alliant Energy*" references in the footer of each page. References for "*Alliant*" can be found on Page ii (1 reference in second paragraph and fourth paragraph); Page 1-1 (1 reference in first paragraph of Section 1.1 and first paragraph of Section 1.1.4); Page 2-1 (1 reference in first paragraph of Section 2.1); Page 2-4 (1 reference in Table 2.3); Page 3-1 (first paragraph of Section 3.0).
2. Remove "*Fly Ash*" for the description of our ash ponds and describe them as "**Ash Ponds**". References for "*fly ash*" can be found on Page ii (3 references in second paragraph); Page iii (1 reference in third paragraph); Page 1-2 (1 reference in Section 1.1.7); Page 2-1 (1 reference in first paragraph, 1 reference in second paragraph); Page 2-3 (1 references in second paragraph); Page 4-1 (1 reference in first and second paragraph); Page 6-1 (1 reference in first paragraph of Section 6.1.2); Page 7-4 (1 reference in the last paragraph of Section 7.1.6).

Cover Page:

1. Cover Page – Remove "*Alliant Energy*" and insert "**Interstate Power and Light Company" or "IPL"**".
2. Cover Page - Remove "*Fly Ash Impoundments*" and insert "**Ash Impoundments**".

Introduction:

1. Page ii, Fourth Paragraph – Both ash ponds were rated as "*Fair*" due to lack of documentation and some discrepancies described in the previous paragraph of this section. Please change these ratings to "**Satisfactory**" based on our comments and the attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report and the Ash Pond 1 and 2 Slope Stability Report prepared by Black and Veatch on behalf of the Ottumwa Generating Station.

Section 1.1.2 and 1.1.3:

1. Page 1-1, Hydrologic/Hydraulic Safety and Supporting Documentation – See the attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report, Rev 1 and the Ash Pond 1 and 2 Slope Stability Report prepared by Black and Veatch on behalf of the Ottumwa Generating Station. These reports should address the concerns of Sections 1.1.2 and 1.1.3.

Section 1.1.8:

1. Page 1-2, Continued Safe and Reliable Operation – Both ash ponds were rated as “Fair” due to an apparent discrepancy of the hydrologic/hydraulic analysis. Please change this rating to “**Satisfactory**” based on the attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report, Rev 1 prepared by Black and Veatch on behalf of the Ottumwa Generating Station.

Section 1.2.1:

1. Page 1-3, Structural Stability –Please see the Ash Pond 1 and 2 Slope Stability Report prepared by Black and Veatch on behalf of the Ottumwa Generating Station. This report should address the concerns this section

Section 1.2.2 and 1.2.3:

1. Page 1-3, Hydrologic/Hydraulic Safety and Supporting Documentation – See the attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report and the Ash Pond 1 and 2 Slope Stability Report prepared by Black and Veatch on behalf of the Ottumwa Generating Station. These reports should address the concerns of Sections 1.2.2 and 1.2.3.

Section 1.2.6, Fifth Bullet:

1. Page 1-4, Surface Drainage of Main Ash Pond – During the time of the assessment, the area experienced some significant rainfall events that resulted in the Des Moines River to be above flood stage from June 6, 2010 until September 6, 2010. The area received 40.5 inches of rain from June through September 2010. Average rainfall for this same period is 17.06 inches of rain. We believe the water observed at the toe of the dam was still flood related waters. Our internal Ash Pond inspections of 2009 and 2010 did not note this as a problem. Please remove this recommendation and we will still monitor and evaluate the ash pond impoundments for this issue and address when a problem is observed.

Section 1.3.1:

1. Page 1-4, List of Participants – Remove “*Alliant Energy*” and insert “**Interstate Power and Light Company**” for Jim Allen and Kevin Brehm. The correct Company/organization for William Skalitzky and Jenna Wischmeyer is “**Alliant Energy Corporate Services, Inc.**”

Section 1.3.2:

1. Page 1-4, Acknowledgement and Signature – Remove “October 27, 2010” and insert “**October 6, 2010**” for the actual date of the onsite assessment.

Section 2.3:

1. Page 2-3 and 2.4, first paragraph – This paragraph needs revision to accurately account for the activities associated with this pond. Insert the following: “**Materials stored in the Ash Pond MAY include fly ash; bottom ash; and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include bottom ash sluice waters; non-chemical air heater and boiler wash waters; plant floor drains after processing through an oil/water separator; wastewaters associated with the treatment of Des Moines River water for steam grade waters (including Solids Contacts Unit Sludge); cooling tower blowdown; boiler water blowdown; site sanitary treatment plant effluent; and storm water contributions from the plant. Ash is removed from the ash sluicing area on a weekly basis. Dredged ash is either beneficially reused or landfilled. The intent is to have no net increase of ash in the pond**”.
2. Page 2-4, second paragraph – Please insert “**non-chemical**” in front of “*boiler wash water, turbine cleans, and boiler cleans*”. If a chemical clean of this equipment takes place, the chemical portion of the water is collected and processed through the boiler as part of the sites Title V Air Permit. All rinse waters, after chemical analysis confirmation, are discharged into this pond.

Section 2.5:

1. Page 2-5, Critical Infrastructure – Remove “*A critical infrastructure survey was not provided to Dewberry for Review*”. During the assessment, this map was provided but due to CBI claims, a copy was not provided. See the attached map.

Section 3.1:

1. Page 3-1, first paragraph, NPDES Permit – Please insert the following language at the end of the last sentence: “**IPL is authorized to continue discharging under the existing NPDES Permit since the NPDES Permit Renewal Application was submitted at least 180 days prior to the expiration of the permit. The reason for the delay in issuance of the permit is a backlog of NPDES permit renewal applications at the State of Iowa**”.
2. Page 3-1, third paragraph, Zero Liquid Discharge Pond – Remove “*A pump must be deployed to remove stored material from that impoundment,*”. Settled material is not removed from the pond via pump. In 2010, we received IDNR approval to remove excess rain water from the pond due a number of excessive rain events to prevent a possible failure/breach of the impoundment berm (which also serves as the plant rail line for coal deliveries). Under normal weather conditions, the water in this pond is not pumped or discharged.

Section 4.1.1:

1. Page 4-1, second paragraph, Original Construction – Remove the sentence “*Water is transferred from the Zero Liquid Discharge Pond to the Main Pond using a temporary pump deployed by plant personnel*”. In 2010, as stated in the comment for Section 3.1 Comment #2, a temporary pump was deployed to pump excess rain water from the zero liquid discharge pond to the Main Pond discharge structure. Water was not pumped from the zero liquid discharge pond into the main pond. Normally, the zero liquid discharge pond (hence the name) does not discharge nor is it permitted to discharge to a Water of the State. During the months of June through September 2010, the area received 40.5 inches of rain. Average rainfall for this same period is 17.06 inches of rain.

Section 4.2.1:

1. Page 4-2, Figure 4.2.1-1 Caption – Remove “*stilling*” and insert “**Settling or Polishing Basin**”.
2. Page 4-2, first paragraph; second, third, and fourth sentences – Remove all of these sentences because the zero liquid discharge pond does not temporarily store fly ash or plant maintenance waters. The pond does accept non-chemical clean waters from boiler cleaning and turbine cleaning. Water from the pond is not pumped to the Main Ash Pond. See Comment 1 of Section 4.1.1 above.

Section 5.3.2:

1. Page 5-8, Figure 5.3.2-1 Caption – Remove “*wet*” and insert “**West**”.

Section 6.1.2:

1. Page 6-1, second paragraph, first sentence – There is a typo. Please change “*Mani*” to “**Main**”.
2. Page 6-1, second paragraph – The attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report, Rev 1 prepared by Black and Veatch on behalf of the Ottumwa Generating Station will address the freeboard concerns. Also, as mentioned throughout this report, the Main Pond discharge outlet structure has removable plates that can increase or decrease the amount of freeboard required to accommodate a wide range of storm events.
3. Page 6-2, first paragraph – See the attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report, Rev 1 prepared by Black and Veatch on behalf of the Ottumwa Generating Station for the hydraulic analysis of the Zero Liquid Discharge Pond.

Section 6.2:

1. Page 6-2, first and second paragraph – See the attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report, Rev 1 prepared by Black and Veatch on behalf of the Ottumwa Generating Station and rephrase this paragraph to reflect the data/analysis provided in the report.

Section 7.1.1 and 7.1.2:

1. Page 7-1, first paragraph of both Sections – The report list the dates of the Black and Veatch Reports as *October 22, 1010*". This is a typo as the year should be "**2010**". However, please use the information in the latest revision of the Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report, Rev 1 and the Ash Pond 1 and 2 Slope Stability Report prepared by Black and Veatch on behalf of the Ottumwa Generating Station.

Section 6.3:

2. Page 6-2, first paragraph - Both ash ponds were rated as "*Fair*" due to lack of documentation and some discrepancy between the pool elevations assumed in the analysis and the current pool elevation. Please change these ratings to "**Satisfactory**" based on our comments and the attached Ash Settling Pond and Zero Liquid Discharge Pond Hydraulic Report, Rev 1 and the Ash Pond 1 and 2 Slope Stability Report prepared by Black and Veatch on behalf of the Ottumwa Generating Station.

Section 8.0:

1. Page 8-1, first paragraph -This paragraph needs revision to accurately account for the activities associated with this pond. Insert the following: "**Materials stored in the Ash Pond MAY include fly ash; bottom ash; and economizer ash from past sluicing activities. The Main Ash Pond is operated to provide additional treatment of process generated wastewaters that include the following: bottom ash sluice waters; occasional non-chemical air heater and boiler wash waters; plant floor drains after processing through an oil/water separator; wastewaters associated with the treatment of Des Moines River water for steam grade waters (including Solids Contacts Unit Sludge); cooling tower blowdown; boiler water blowdown; site sanitary treatment plant effluent; occasional landfill leachate; and storm water contributions from the plant. Ash is removed from the ash sluicing area on a weekly basis. Dredged ash is either beneficially reused or landfilled. The intent is to have no net increase of ash in the pond**". The remainder of the paragraph beginning with second sentence "*Wet ash...*" is accurate.
2. Page 8-1, second paragraph – This paragraph needs revision to accurately account for the activities associated with this pond. Insert the following: "**The Zero Liquid Discharge Pond is operated as the stormwater management impoundment for runoff from the associated C-Stone Pile (hydrated fly ash used for beneficial**

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reuse per IDNR regulations). The Zero Liquid Discharge Pond can be used to store/provide treatment for rinsate waters associated with chemical and non-chemical boiler and turbine cleans". This pond does not have a physical outfall structure and is not part of the site NPDES Permit. As mentioned in our comments above (see Comment Section 3.1. Comment 2; and Section 4.1.1, Comment 1), in 2010 the excess water from the result of abnormal summer rains required pumping of the pond to the concrete discharge structure of Outfall 001. This was approved by IDNR.

REQUEST FOR CONFERENCE CALL WITH DEWBERRY & DAVIS, LLC TO REVIEW COMMENTS

Finally, because of the technical complexity and factual detail contained in the Draft Report, IPL believes it would be efficient and helpful to conduct a conference call between IPL and Dewberry & Davis, LLC to review the details of these comments prior to its preparation of a Final Report. IPL would be happy to coordinate the time and set up a call-in number. IPL specifically requests such a discussion.

IPL appreciates this opportunity to provide comments on the Draft Report for the Ottumwa Generating Station. If you have any technical questions, please contact William Skalitzky at (608) 458-3108. If you have any legal questions, please contact Dan Siegfried at (319) 786-4686.

Very truly yours,



Terry L. Kouba
Director, Generation Operations

cc: James Kohler - EPA
William Skalitzky - AECS
Dan Siegfried - AECS
Vernon Hasten - AECS
James Allen - IPL